

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)
)
JOSEPH MARTIN THOMAS,) Bankruptcy Case No. 20-10334 TPA
)
Debtor.) Chapter 11
_____)
)
) Document No. _____
)
) Relates to Doc. No. 265 , 299
)
) Hearing Date & Time:
) March 25, 2021 @ 10:00 a.m.
)
) Responses Due: March 18, 2021

JOINT STIPULATION AND AGREED ORDER

It is hereby stipulated and agreed by and between Steven E. Ribbing and Kay B. Ribbing
(the “Ribblings”) and the Debtor, as follows:

WHEREAS, by Order of Court entered February 23, 2021, the Ribblings were granted
relief from the automatic stay to pursue malpractice claims against the Debtor, subject to the
limitation that any recovery be limited to available insurance proceeds;

WHEREAS, on February 16, 2021, the Debtor filed a Disclosure Statement, Plan
Summary and Plan dated February 15, 2021;

WHEREAS, the Disclosure Statement and Plan each contain provisions pertaining to the
treatment of a class of claims that includes the Ribbing’s claims; and

WHEREAS, the Ribblings have asked the Debtor to agree that notwithstanding anything
set forth in either the Disclosure Statement, Plan or any related documents, nothing therein,
including without limitation any provision that requests or grants the Debtor a discharge, shall

affect the Ribbing's rights to pursue their claims against the Debtor, subject to the limitation that any recovery be limited to available insurance proceeds.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. Each of the above recital clauses is incorporated herein by reference as though fully set forth in this paragraph 1.
2. Notwithstanding anything set forth in either the Disclosure Statement, Plan or any related documents, nothing therein, including without limitation any provision that requests or grants the Debtor a discharge, shall affect the Ribbing's rights to pursue their claims against the Debtor, subject to the limitation that any recovery be limited to available insurance proceeds.

Dated: March 12, 2021

STEVEN E. RIBBING AND KAY B.
RIBBING

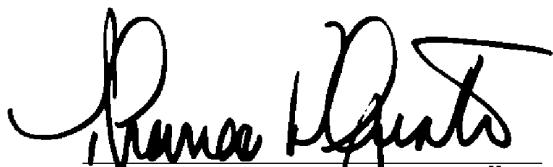
/s/ Ronald B. Roteman
Ronald B. Roteman, Esquire
PA ID No. 66809
STONECIPHER LAW FIRM
125 First Avenue
Pittsburgh, PA 15222
(412) 391-8510 phone
(412)391-8522 fax

JOSEPH THOMAS MARTIN

/s/ Michael P. Kruszewski
Michael P. Kruszewski, Esquire
Quinn Law Firm
2222 West Grandview Boulevard
Erie, Pennsylvania 16506
Office: 814-833-2222 x. 1043 |
Direct: 814- 314-1055 | Fax: 814-833-6753

Dated: March 15, 2021

IT IS SO ORDERED:



Thomas P. Agresti, Judge jlm
United States Bankruptcy Court

In re:
Joseph Martin Thomas
Debtor

Case No. 20-10334-TPA
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0315-1
Date Rcvd: Mar 15, 2021

User: culy
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 17, 2021:

Recip ID	Recipient Name and Address
db	+ Joseph Martin Thomas, c/of Tri-State Pain Institute, 2374 Village Common Drive, Erie, PA 16506-7201

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 17, 2021

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 15, 2021 at the address(es) listed below:

Name	Email Address
Andrew F Gornall	on behalf of Interested Party Barbara Noonan andygornall@latouflawfirm.com
Brian Nicholas	on behalf of Creditor PNC BANK NATIONAL ASSOCIATION bnicholas@kmlawgroup.com
Crystal H. Thornton-Illar	on behalf of Creditor The Kada Gallery cThornton-Illar@leehtishman.com bankruptcy@leehtishman.com;mproden@leehtishman.com;thornton-illarc81012@notify.bestcase.com
Gary V. Skiba	on behalf of Interested Party Tri-State Pain Institute LLC gskiba@marshlaw.com, DGeniesse@marshlaw.com;rose227@hotmail.com
Guy C. Fustine	on behalf of Creditor Official Committee of Unsecured Creditors for Tri-State Pain Institute LLC mwernick@kmgslaw.com, knoxbank@hotmail.com,burban@kmgslaw.com,amulryan@kmgslaw.com

District/off: 0315-1

User: culy

Page 2 of 2

Date Rcvd: Mar 15, 2021

Form ID: pdf900

Total Noticed: 1

Lauren Michaels

on behalf of Creditor Office of Attorney General Department of Revenue lmichaels@attorneygeneral.gov

Mark G. Claypool

on behalf of Creditor Ally Bank serviced by Ally Servicing LLC mclaypool@kmgslaw.com
knoxbank@hotmail.com;chartle@kmgslaw.com;aklus@kmgslaw.com

Michael F.J. Romano

on behalf of Interested Party TIAA Commercial Finance Inc. mromano@rgalegal.com,
tyowell@rgalegal.com;jromano@rgalegal.com

Michael F.J. Romano

on behalf of Creditor TIAA Commercial Finance Inc. mromano@rgalegal.com, tyowell@rgalegal.com;jromano@rgalegal.com

Michael P. Kruszewski

on behalf of Debtor Joseph Martin Thomas mkruszewski@quinnfirm.com
knottingham@quinnfirm.com;mboni@quinnfirm.com;quinnbankruptcy@gmail.com;mmbquinnbankruptcy@gmail.com;mtrayer
@quinnfirm.com;gbebkko@quinnfirm.com;jiddings@quinnfirm.com

Michael P. Kruszewski

on behalf of Debtor 2374 Village Common Drive LLC mkruszewski@quinnfirm.com
knottingham@quinnfirm.com;mboni@quinnfirm.com;quinnbankruptcy@gmail.com;mmbquinnbankruptcy@gmail.com;mtrayer
@quinnfirm.com;gbebkko@quinnfirm.com;jiddings@quinnfirm.com

Norma Hildenbrand, on Behalf of the United States Trustee by

on behalf of U.S. Trustee Office of the United States Trustee Norma.L.Hildenbrand@usdoj.gov

Office of the United States Trustee

ustpregion03.pi.ecf@usdoj.gov

Ronald B. Roteman

on behalf of Creditor Kay B. Ribbing rroteman@stonecipherlaw.com cbeard@stonecipherlaw.com

Ronald B. Roteman

on behalf of Creditor Steven E. Ribbing rroteman@stonecipherlaw.com cbeard@stonecipherlaw.com

Salene R.M. Kraemer

on behalf of Creditor WELLS FARGO BANK N.A. skraemer@bernsteinlaw.com, salene@ecf.courtdrive.com

TOTAL: 16